



PULP

PENNSYLVANIA
UTILITY LAW PROJECT

March 4, 2026

Via Email Only

Honorable F. Joseph Brady and
Honorable Alphonso Arnold III
Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
Piatt Place, Suite 220
201 Fifth Avenue
Pittsburgh, PA 15222
fbrady@pa.gov
alphonarno@pa.gov

**Re: Pennsylvania Public Utility Commission v. UGI Utilities, Inc. – Gas Division
Docket No. R-2025-3059523**

Prehearing Conference Memorandum of CAUSE-PA

Your Honors:

Please find the attached **Prehearing Conference Memorandum of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA)** in the above noted proceeding.

As indicated on the attached Certificate of Service, service on the parties was accomplished by email only.

Respectfully Submitted,

John W. Sweet, Esq.
Counsel for CAUSE-PA

CC: Pam McNeal at pmcneal@pa.gov
Eric Ball at erball@pa.gov
Secretary Matthew Homsher (via E-file only)
Certificate of Service

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission :
 :
 v. : Docket No. R-2025-3059523
 :
 UGI Utilities, Inc. - Gas Division :

**PREHEARING CONFERENCE MEMORANDUM
OF THE COALITION FOR AFFORDABLE UTILITY SERVICES
AND ENERGY EFFICIENCY IN PENNSYLVANIA**

PENNSYLVANIA UTILITY LAW PROJECT

Counsel for CAUSE-PA

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March 4, 2026

I. Introduction

On February 20, 2026, a Prehearing Conference Order was issued by the Honorable Administrative Law Judges (ALJs) F. Joseph Brady and Alphonso Arnold III, setting a telephonic prehearing conference for Friday, March 6, 2026 at 10:00 a.m., and requiring parties to file a Prehearing Memorandum no later than Wednesday, March 4, 2026 at 12:00 p.m. In response, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA), through its counsel at the Pennsylvania Utility Law Project, hereby files this Prehearing Conference Memorandum.

II. Background

On January 28, 2026, UGI Utilities, Inc – Gas Division submitted a filing, Supplement No. 63 to UGI Gas Tariff – Pa. P.U.C. Nos. 7 and 7S (“Supplement No. 63”), with a proposed effective date of March 29, 2026, seeking to raise rates by \$99.368 million, or by 8.05%. Supplement No. 63 also proposes additional changes to tariff rates, riders, and tariff terms and conditions, as described in the filing. (Statement of Reasons at 1). If UGI’s rate increase is approved in its entirety, the monthly bill of a typical UGI residential customer receiving default service and using 68.7 ccf per month would increase from \$113.64 to \$123.55, or by 8.7%. (Id.) In its proposed rate structure, UGI seeks to increase its fixed monthly residential customer charge 41.5% from \$16.25 to \$23.00, an increase of \$6.75 per month – or \$81.00 per year. (UGI St. 11 at 23). UGI also seeks to extend its Weather Normalization Adjustment for an additional 5 years. (Id. at 32).

On February 10, 2026, CAUSE-PA filed a Formal Complaint in the above-captioned proceeding, at Docket No. R-2025-3059523, which was docketed at Docket No. C-2026-3060448. On February 12, 2026, the Commission issued a Secretarial Letter requiring and answer to be filed

within 10 days. No answer or objection was filed to CAUSE-PA's standing to fully participate in this proceeding as a Complainant and party.

On February 19, 2026, the Commission entered a Suspension and Investigation Order suspending the UGI tariff by operation of law, and opening an investigation to determine the lawfulness, justness, and reasonableness of the rates, rules, and regulations contained therein. (S&I Order).

III. Issues to be Presented

In addition to compliance with sound rate making principles, including the requirement that rates be just and reasonable, UGI must also ensure that its rates and tariff comply with universal service requirements. See 66 Pa. C.S. § 2203(8). In determining whether rates are just and reasonable, the Commission must examine whether rates are affordable and accessible to those served.

In the event that the Commission approves any natural gas distribution rate increase, the Commission should condition approval on UGI's agreement to perform such actions as are necessary to assure compliance with applicable sections of the Public Utility Code, Commission regulations and guidelines, and settlement agreements.

CAUSE-PA has conducted an initial review of UGI's proposed tariff changes and testimony and opposes UGI's request on the grounds that the proposed rate increase and tariff changes may result in unjust and unreasonable rates that would impose severe hardship on low income and otherwise economically vulnerable residential customers. CAUSE-PA identifies the following specific issues of concern, which must be addressed in this proceeding, though it reserves the right to raise additional issues which may arise through the course of this proceeding:

- i. The conformity to law and the effect of UGI's rate filing and proposed rate increase on low income and otherwise economically vulnerable households.
- ii. The need for the overall revenue requirement sought and its impact on the ability of low income households to afford gas service.
- iii. The effect of UGI's revenue requirement allocation proposal on the ability of low income customers' ability to afford to connect to and maintain gas service.
- iv. The effect of UGI's proposed \$23.00 fixed residential customer charge on low income and otherwise economically vulnerable households, and the ability to achieve appreciable bill savings through adoption of energy efficiency measures.
- v. The effect of UGI's rate filing and proposed rate increase on low income and otherwise economically vulnerable households enrolled in or eligible for UGI's Universal Service Programs, and the continued adequacy of those programs in delivering universally accessible service.
- vi. The impacts of UGI's Weather Normalization Adjustment (WNA) mechanism on low income and otherwise economically vulnerable customers. Based on a preliminary review, CAUSE-PA submits that the continued application of UGI's WNA may result in unjust, unreasonable, and discriminatory rates for consumers and must be reviewed by the Commission.
- vii. The conformity to law and the effect of UGI's current and proposed tariffs.
- viii. The justness and reasonableness of UGI's allocation of its Universal Service Costs and its proposal to allow the USP Rider to apply on a fully negotiated basis for certain Rate XD customers or whether a more broad allocation of those costs to all ratepayers is appropriate.
- ix. Other issues which may arise through CAUSE-PA's review of NFG's tariff supplement, its filings, discovery responses, and the testimony of the parties during the course of the proceeding.

IV. Witnesses and Testimony

CAUSE-PA intends to present the following witnesses to testify in this matter, but reserves the right to call additional or substitute witnesses as may be warranted upon proper notice to

Your Honors and the parties:

Patrick M. Cicero, Of Counsel
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
pcicero@pautilitylawproject.org

Mr. Cicero will address the issues identified above, as well as other issues that may arise throughout this proceeding.

V. Discovery

CAUSE-PA supports the discovery modifications proposed by the Office of Consumer Advocate (OCA).

VI. Settlement

CAUSE-PA is willing and ready to engage in settlement discussions in an attempt to resolve or narrow the issues in this proceeding, with any and all parties, and encourages the parties to engage in settlement discussions early in the process.

VII. Service on CAUSE-PA

CAUSE-PA is represented by the attorneys at the Pennsylvania Utility Law Project. All documents should be served on CAUSE-PA as follows:

John W. Sweet, Esq., PA ID: 320182
Ria M. Pereira, Esq., PA ID: 316771
Elizabeth R. Marx, Esq., PA ID: 309014
Lauren N. Berman, Esq., PA ID: 310116
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CAUSE-PA requests that parties agree to electronic service in this proceeding.

VIII. Representation of CAUSE-PA at Prehearing Conference

At the Prehearing Conference, CAUSE-PA will be represented by John W. Sweet, Esq.

IX. Litigation Schedule

CAUSE-PA has been involved in discussions with UGI and other parties to reach a mutually agreeable litigation schedule. CAUSE-PA believes that the parties have agreed to the following litigation schedule:

Non-Company Direct	Monday, April 13, 2026
Rebuttal	Wednesday, May 13, 2026
Surrebuttal	Wednesday, May 27, 2026
Written Rejoinder	Monday, June 1, 2026
Hearings	June 2-3, 2026
Main Brief	Tuesday, June 23, 2026
Reply Brief	Monday, July 6, 2026

Due to conflicts with the hearing dates in other cases, CAUSE-PA respectfully requests that its witness Patrick Cicero's appearance at the evidentiary hearings be limited to June 3, 2026.

CAUSE-PA circulated its request to the parties via email on March 3, 2026. No party has

expressed any objection to CAUSE-PA's request that Mr. Cicero's appearance at evidentiary hearings be limited to June 3, 2026

X. Public Input Hearings

Given the size of the requested rate increases and the customer impact it may cause, CAUSE-PA respectfully requests that public input hearings be held in this matter.

WHEREFORE, CAUSE-PA respectfully submits this Prehearing Conference Memorandum.

Respectfully submitted,
PENNSYLVANIA UTILITY LAW PROJECT
Counsel for CAUSE-PA

A handwritten signature in blue ink that reads "John Sweet". The signature is stylized with a horizontal line above the name and a large, sweeping flourish below it.

John W. Sweet, Esq., PA ID: 320182
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 UGI Utilities, Inc. – Gas Division :

Certificate of Service

I hereby certify that I have this day served copies of the **Prehearing Conference Memorandum of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania** upon the parties of record in the above captioned proceeding in accordance with the requirements of 52 Pa. Code § 1.54.

Via Email

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Respectfully Submitted,
PENNSYLVANIA UTILITY LAW PROJECT
Counsel for CAUSE-PA

A handwritten signature in blue ink that reads "John Sweet". The signature is stylized, with the first letter of each name being large and prominent.

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